

Raytheon by James J. McCarthy

Page 154

1 was assembled on the first floor of Building 1.
 2 Q. That's the only one you recognize on the
 3 whole list?
 4 A. It's the only one I recognize on the whole
 5 list, because it was a tube I believe sold to the
 6 FAA, and it was -- while some of the tubes on the
 7 second floor, for example, of Building 1 were
 8 inches in length and an inch or two in maximum
 9 diameter, the PPA 200 tube was very large -- six,
 10 eight, ten feet long -- and had to be handled on
 11 pivoted and hinged racks to perform assembly
 12 operations, so it stood out in my mind.
 13 Q. Do the letters PPA stand for anything that
 14 you know of?
 15 A. I'm sure they do. I can't tell you what
 16 they mean.
 17 Q. Is that true of all the letters in these
 18 boxes; QKA, QKW and so on?
 19 A. I'm sure they mean something. I don't know
 20 what they mean.
 21 Q. When it says at the bottom of this, this
 22 page that tubes containing this material must be
 23 marked in accordance with the directive contained
 24 in Standard Number 373066 dash 130, does that mean

Page 155

1 that they must be tagged with the red tag warning
 2 about beryllium -- beryllium oxide?
 3 A. I don't think so.
 4 Q. What do you think it means?
 5 A. I think it means that the final product
 6 tube must have a marking on it to indicate that it
 7 contains a beryllium or beryllium compound just to
 8 identify its content. That's how I would read it.
 9 Q. What is Machlett Laboratories?
 10 A. Machlett Laboratories, I believe is the
 11 pronunciation, was a Raytheon facility located in
 12 Connecticut. It was closed, I believe, before I
 13 got to Waltham and may have been closed before I
 14 even joined Raytheon. It was at one time, I
 15 understand, a -- an operating facility of the
 16 Raytheon Company Microwave and Power Tube Division.
 17 Q. Did the Machlett facility work with
 18 beryllium-containing parts?
 19 A. I don't have any direct personal knowledge
 20 of that.
 21 Q. Did you ever see any Raytheon policies or
 22 procedures that related to the handling of
 23 beryllium or beryllium compounds at the Machlett
 24 facility?

Page 156

1 A. The policies and procedures in general that
 2 you've presented here in this deposition, many of
 3 those are microwave and power tube division
 4 policies and procedures, and to the extent and if
 5 such materials were used at Machlett, those
 6 policies and procedures would have applied in those
 7 date -- time frames.
 8 Q. Do you know if Machlett worked with any
 9 pure beryllium metal?
 10 A. I don't.
 11 Q. Was there any plant in the microwave and
 12 power tube division that did work with beryllium
 13 metal?
 14 A. I don't recall ever encountering it in my
 15 time at Raytheon, nor do I recall ever seeing any
 16 document that specifically spelled out metallic
 17 beryllium, elemental beryllium as an actual
 18 material in use.
 19 MR. UBERSAX: Mark that as the next
 20 exhibit, please.
 21 (Exhibit 13 marked for identification.)
 22 VIDEO OPERATOR: This marks the end of
 23 videotape number two in the Deposition of James
 24 McCarthy. Going off the record, 2:02 p.m.

Page 157

1 (Off the record.)
 2 VIDEO OPERATOR: This marks the
 3 beginning of videotape number three in the
 4 Deposition of James McCarthy. On the record, 2:03
 5 p.m.
 6 Q. (BY MR. UBERSAX) We've marked Exhibit 13,
 7 RAY 1509 to 1512. Do you recognize that document,
 8 sir?
 9 A. I don't think I've ever seen this document
 10 before. It appears to be a Machlett-labeled
 11 document titled rules for personal hygiene program,
 12 metal processing department dash beryllium, and it
 13 has several dates on it, the earliest of which is
 14 1960 something. I can't read it because the copy
 15 is bad.
 16 Q. Did the Machlett facility have its own
 17 rules for handling beryllium?
 18 A. I don't know.
 19 (Exhibit 14 marked for identification.)
 20 Q. Exhibit 14 is RAY 1496 to 97. Do you
 21 recognize Exhibit 14?
 22 A. Yes.
 23 Q. Can you tell us what that is, please?
 24 A. It's an internal Raytheon memo from Kerry

40 (Pages 154 to 157)

JONES REPORTING COMPANY
 617-451-8900

